## UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Pennsylvania American Water Company, Petitioner,	
v.	Case No. 15-1694
National Labor Relations Board, Respondent, and	(NLRB Nos. 06-CA-037197, 06-CA-037198, 06-CA-037202, 06-CA-037241, and 06-CA-037243)
Utility Workers' Union of America AFL-CIO, Local Union 537, Intervenor.	
National Labor Relations Board, Petitioner, v.	Case No. 15-1917
Pennsylvania American Water Company, Respondent and	
Utility Workers' Union of America, AFL-CIO, System Local No. 537, Intervenor.	

## CONSENT MOTION TO EXTEND BRIEF DUE DATES

Petitioner, Pennsylvania American Water Company ("Company"), with the consent of the National Labor Relations Board ("NLRB") and Intervenor Utility Workers Union of American AFL-CIO, System Local 537 ("Union") requests this Honorable Court grant a thirty-nine (39) day extension of the briefing scheduling to allow the Company and Union to continue their ongoing settlement discussions regarding matters that, amongst other things, involve this case. The Company and Union are unable to schedule their next settlement discussion meeting until mid-August; thus, they request this briefing extension to move the due date of the Company's brief from July 20, 2015 to August 28, 2015 and the NLRB's and Union's brief to be due thirty days after service of the Company's brief (and any reply brief by the Company to be due within fourteen days after service of the NLRB's and Union's briefs).

Respectfully submitted,

s/ Craig M. Brooks
Craig M. Brooks, Esq.
Houston Harbaugh, P.C.
Three Gateway Center
401 Liberty Avenue, 22<sup>nd</sup> Floor
Pittsburgh, PA 15222
cbrooks@hh-law.com
412-288-2214

Date: July 14, 2015 Attorney for Pennsylvania American Water Co.

## **CERTIFICATE OF SERVICE**

I hereby certify that, on July 14, 2015, copies of foregoing Pennsylvania American Water Company's Consent Motion to Extend Brief Due Dates, was served electronically via the United States Court of Appeals for the Third Circuit's ECF System, by which electronic notification of the filing will be sent to the following:

Valerie Collins, Esq.
Linda Dreeben, Esq.
Elizabeth A. Heaney, Esq.
NATIONAL LABOR RELATIONS BOARD
1099 14<sup>th</sup> Street, NW, Suite 8815
Washington, DC 20570
(Counsel for NLRB)

Samuel J. Pasquarelli, Esq. Sherrard, German & Kelly, P.C. 28<sup>th</sup> Floor, Two PNC Plaza 620 Liberty Avenue Pittsburgh, PA 15222 (Counsel for Intervenor Union)

s/ Craig M. Brooks
Craig M. Brooks